

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-80101-CR-CANNON

UNITED STATES OF AMERICA

Plaintiff,

vs.

**DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,**

Defendants.

**GOVERNMENT'S SUPPLEMENTAL RESPONSE
TO STANDING DISCOVERY ORDER**

The United States of America, by and through the Special Counsel's Office, files this pleading to supplement prior responses (ECF Nos. 30, 59, 80, 92) to the Standard Discovery Order, issued on June 13, 2023 (ECF No. 16). This pleading complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16.

Per the protective order issued in this case (ECF No. 27), the Government has provided three prior productions of discovery to Defendants Donald J. Trump and Waltine Nauta. *See* ECF Nos. 30, 59, 80, 92. Now that counsel for Defendant De Oliveira (John Irving and Larry Donald Murrell, Jr.) have entered an appearance, the Government has provided the three productions to counsel for Defendant De Oliveira. The productions include written or recorded statements of Defendant De Oliveira, and the Government has provided to counsel Defendant De Oliveira's NCIC records.

The Government is aware of its continuing duty to disclose newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, *Brady*, *Giglio*, *Napue*, and the obligation to assure a fair trial.

Respectfully submitted,

JACK SMITH
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By: /s/ Jay I. Bratt
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 11, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

s/ Julie A. Edelstein
Julie A. Edelstein
Senior Assistant Special Counsel